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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**SEALED**

**ST. MATTHEW'S UNIVERSITY (CAYMAN)  
LTD. a Cayman Islands company,**

Plaintiff,

vs.

**ASSOCIATION OF AMERICAN  
INTERNATIONAL MEDICAL  
GRADUATES, a Nevada domestic  
corporation; "presaaimg@hotmail.com,"  
a.k.a. THOMAS MOORE, M.D., an  
individual;  
"execsecaaimg@hotmail.com," a.k.a.  
SARAH WEINSTEIN, an individual;  
RACHAEL E. SILVER, an individual; and  
DOES 1-10,**

Defendants.

Case No. CV-S-05-0848-RCJ(LRL)

**[PROPOSED]**

**COURT DIRECTED ORDER TO  
PRESERVE EVIDENCE**

**SEALED**

YOU ARE HEREBY ORDERED to comply with the following:

1. You must preserve any and all documents, data, and tangible things in your possession, custody, or control pertaining in any way to the entity ASSOCIATION OF

1 AMERICAN MEDICAL GRADUATES, INC. ("AAIMG"), the email address  
 2 "presaaimg@hotmail.com," the email address "execsecaaimg@hotmail.com," and the  
 3 domain name "aaimg.com." This duty extends to any employees, agents, contractors,  
 4 carriers, bailees, or other non-parties who possess materials reasonably anticipated to be  
 5 subject to discovery in connection with the above named party.

6 2. "Documents, data, and tangible things" is to be interpreted broadly, to  
 7 include writings; records; files; correspondence; reports; memoranda; calendars; diaries;  
 8 minutes; electronic messages; voicemail; email; telephone message records or logs,  
 9 computer and network activity logs; hard drives; backup data; removable computer  
 10 storage media such as tapes, disks, and cards; printouts; document image files; web  
 11 pages; databases; spreadsheets; software; books; ledgers; journals; orders; invoices;  
 12 bills; vouchers; checks; statements; worksheets; summaries; compilations; computations;  
 13 charts; diagrams; graphic presentations; drawings; films; charts; digital or chemical  
 14 process photographs; video, phonographic, tape, or digital recordings or transcripts  
 15 thereof; drafts, jottings, and notes; information that serves to identify, locate, or link such  
 16 material, such as file inventories, file folders, indices, and metadata; and account  
 17 information, IP origination information, IP logs for use of email accounts, and email  
 18 communications associated with the above referenced Hotmail addresses, is also  
 19 included in this definition.

20 3. "Preservation" is to be interpreted broadly to accomplish the goal of  
 21 maintaining the integrity of all documents, data, and tangible things reasonably  
 22 anticipated to be subject to discovery in connection with the identified party under Fed. R.  
 23 Civ. P. 26, 45, and 56(e). Preservation includes taking reasonable steps to prevent the  
 24 partial or full destruction, alteration, testing, deletion, shredding, incineration, wiping,  
 25 relocation, migration, theft, or mutation of such material, as well as negligent or intentional  
 26 handling that would make material incomplete or inaccessible.

1           4.     If your business practices, or those of your employees, agents, contractors,  
2 carriers, or bailees in possession, involve the routine destruction, recycling, relocation, or  
3 mutation of such materials, you must, for the pendency of this order, either:

- 4               a. Halt such business processes,  
5               b. Sequester or remove such material from the business process, or  
6               c. Arrange for the preservation of complete and accurate duplicates or  
7               copies of such material, suitable for later discovery if requested.

8           5.     This order shall remain in effect until modification by subsequent order, or  
9 until the termination of the case pursuant to which this order is issued by order or by final  
10 adjudication.

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13 **IT IS SO ORDERED.**

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15 DATED: 7-15-05

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UNITED STATES DISTRICT JUDGE

1 SUBMITTED:

2 Dated: July 8, 2005

KRONENBERGER & ASSOCIATES

3  
4 By: Karl S. Kronenberger  
5 Karl S. Kronenberger  
6 Terri R. Hanley  
7 Attorneys for Plaintiff  
ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.

8 DATED: July 11, 2005.

9 GREENBERG TRAURIG, LLP  
10 By: Mark G. Tratos  
11 Mark G. Tratos  
12 F. Christopher Austin  
13 Ronald D. Green, Jr.  
14 Designated Local Counsel for Plaintiff  
15 ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.  
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